

Appln No. 09/688,452  
Amdt date August 11, 2005  
Reply to Office action of April 11, 2005

**REMARKS/ARGUMENTS**

Applicants thank the Examiner for his careful consideration of this application. In response to the above-identified Office action and in connection with the Request for Continued Examination (RCE) under 37 C.F.R. Section 114 submitted herewith, Applicants amend the application and seek reconsideration and allowance thereof. In this response, Applicants do not add or cancel any claims. Applicants amend claims 1, 2, 11-14, 16, 19, 20, 26, 30 and 57. Accordingly, claims 1-68 are pending.

**I. Information Disclosure Statements**

Applicants note that the Examiner has not acknowledged the Information Disclosure Statements filed on March 3, 2005, September 16, 2004 or June 14, 2005. If the Examiner requires a further copy of any of these IDS forms, Applicants' respectfully request that the Examiner contact Applicants' undersigned counsel of record.

**II. Interview**

Applicants' attorney conducted an interview with the Examiner on July 26, 2005. Applicants' attorney reviewed the disclosure of the present invention and attempted to clarify the subject matter that was intended to be claimed and the subject matter that distinguished the present invention from the references cited in the application as well as references cited

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in other applications owned by the assignee that have similar disclosures and subject matter.

While no formal agreement was reached on claim language, the Examiner and Applicants' attorney discussed language to clarify the functionality of the cryptographic modules. Specifically, the language "each of the plurality of cryptographic modules is programmable to service any of the user terminals" was discussed. The Examiner indicated that the use of this language would likely distinguish the claims from the references cited in the present application. This language was understood as encompassing the cryptomodules' ability to interchangeably service any user. Applicants have amended the claims of this application in light of the Examiner's suggested language, using the suggested language or similar language.

### **III. Claims rejected under 35 U.S.C. § 103**

The Examiner has rejected claims 1-68 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,005,945 issued to Whitehouse (hereinafter "Whitehouse") in view of U.S. Patent 6,424,954 (hereinafter "Leon"). Applicants respectfully request reconsideration and withdrawal of the rejection of these claims.

To establish a *prima facie* case of obviousness, the Examiner must establish that the cited references, combined, teach or suggest each of the elements of the claims. In regard to independent claims 1, 30 and 57, these claims include the elements of "wherein each cryptographic module is programmable to service any of the plurality of user terminals" as recited in

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claim 1 or similar elements including "wherein each of the plurality of cryptographic devices accesses data elements for any of the plurality of user terminals" (claim 30) and "wherein the cryptographic device processes data for any of the plurality of users" (claim 57).

As discussed above in regard to the Interview of July 26, 2005, Applicants do not believe that these elements of the claims are taught or suggested by Whitehouse or Leon. Rather, Whitehouse discloses a system where processing of user requests is done through a central server using a general purpose processor executing a set of functions in general memory. User data is stored on a specific central server. See Whitehouse, Fig. 4, illustrating memory 154 and customer database 172. Also, Leon discloses a system where a postal security device (PSD) is connected directly to a local computer. See, Leon Abstract and Figs. 1A and 1B. Therefore, Whitehouse in view of Leon does not teach or suggest each of the elements of claims 1, 30 and 57. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

In regard to claims 2-29, 31-56 and 58-68, these claims depend from independent claims 1, 30 and 57, respectively and incorporate the limitations thereof. Thus, at least for the reasons mentioned above, Whitehouse in view of Leon does not teach or suggest each of the elements of these claims. In addition, these claims include elements that in combination with the independent claims further distinguish them over the cited references. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

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Conclusion

In view of the foregoing, it is believed that all claims now pending, namely claims 1-68 patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (626) 795-9900.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By   
Jonathan S. Miller  
Reg. No. 48,534  
626/795-9900

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